



April 25, 2014

VIA Email

Adam Lid
Public Works Committee
City of Los Angeles
Los Angeles, CA 90012
Adam.Lid@lacity.org

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Re: Public Comment Council File 13-1580, Eliminate Rodenticides in Los Angeles

Dear Mr. Lid,

On behalf of the Center for Biological Diversity ("Center") and our over 6,000 supporters in the city of Los Angeles, we strongly support steps by the City of Los Angeles to eliminate the use and harms of rodenticides in Los Angeles.

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has worked to address the ecological and human health impacts posed by chemical rodenticides across the United States, including on a broader scale in California. Because of this, the Center encourages the city to engage in a thorough and searching review of pesticide use and harms and, ultimately, to act to rid the city of rodenticides that post a significant threat to children, pets, and wildlife.

All forms of rodenticides are designed to kill mammals, so their effects on humans and other non-target mammals are qualitatively the same as their effect on target pests. Rodenticides can be divided into three broad classes in terms of their effects: first generation anticoagulants, second generation anticoagulants, and nonanticoagulants. The first and second generation anticoagulants interfere with blood clotting and death results from hemorrhage. Second-generation anticoagulant rodenticides, however, have a much higher risk of severe unintended poisoning for children, pets, and other non-target wildlife than their first-generation counterparts. This is due to the fact that second-generation anticoagulants remain in the body long after consumption, with half-lives of up to 350 days. As a result, predatory birds and mammals that feed on exposed rodents are especially vulnerable to secondary poisoning from second-generation anticoagulants.

The list of non-target species that are already harmed by rodenticides in California is extensive, and includes coyotes, red and gray foxes, raccoons, bobcats, mountain lions, and birds of prey such as eagles, hawks, and owls, whose rodent-based diets lead to the highest exposure and mortality levels of any affected species. The results of an investigation by the California Department of Pesticide Regulation ("Cal DPR") show that across 35 different species testing positive for rodenticide exposure, 73% of all wildlife tested had ingested at least one

anticoagulant rodenticide.¹ Indeed, recent data suggests that it is becoming increasingly difficult to find uncontaminated raptors like red-tailed hawks and great horned owls, and that the majority of predatory birds in close proximity to humans now carry multiple rodenticide residues.

Studies of carnivorous mammals also show a relationship between pesticide exposure levels and the proportion of a species' home range that was made up of developed areas. These are troubling figures, especially considering that California counties with the highest rodenticide use are those that are the most urban and those with the highest population centers, in particular those in Southern California.² Continued use of anticoagulant rodenticides, in particular the second-generation variety, is both hazardous and unnecessary because there are numerous, less dangerous alternatives available to address the problems caused by rodent infestation.³

In 2014, California issued regulations to make the pesticide active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone restricted materials because of the threats posed by second-generation anticoagulant rodenticides.⁴ This designation, which goes into effect on July 1, 2014, will prohibit the use of second-generation anticoagulant rodenticides by the general public because restricted materials can only be possessed or used under the supervision of a certified private applicator or a certified commercial applicator.⁵

Although Los Angeles cannot preempt state regulations by enacting a full ban on anticoagulant rodenticides, there are many significant steps the city can take right now to protect Los Angeles' wildlife, people, and pets. First, Los Angeles can and should urge businesses to no longer use or sell anticoagulant rodenticides, and urge property owners to cease purchasing or using anticoagulant rodenticides on their properties in Los Angeles. Most importantly, the city should lead by example and send a strong message to citizens by committing to not use anticoagulant rodenticides as part of its maintenance programs for city-owned and managed parks and facilities.⁶

We urge Los Angeles to show leadership in protecting its residents and environment from dangerous rodenticides. Please do not hesitate to contact Jonathan Evans, toxic and endangered species campaign director (jevans@biologicaldiversity.org), with any questions.

Sincerely,

/s/
Kya Marienfeld
Law Clerk
Center for Biological Diversity

cc:
Andy Shrader
Deputy of Environmental Affairs & Sustainability
Office of Councilmember Paul Koretz

¹ Cal DPR 2013, *Memorandum: Second Generation Anticoagulant Rodenticide Assessment* (June 27, 2013) at 10-11.

² In Los Angeles county, the use of second-generation anticoagulant rodenticides brodifacoum and bromadiolone are among the highest in the state, with more of brodifacoum being used in LA county than any other county, and more bromadiolone used than all but two other counties. *Source*: Cal DPR, Pesticide Use Reporting Data for 2010.

³ Integrated Pest Management strategies that prevent, identify, and treat affected areas with rodent proofing and lethal controls like snap traps and electric traps provide long term rodent control without the risk of secondary poisonings or accidental ingestion by children and pets. *See* Safe Rodent Control Resource Center, Rodent Control Strategies, available at <http://saferodentcontrol.org/site/rodent-control/>.

⁴ 3 Cal. Code Regs § 6400; *See generally* Cal DPR 2013, DPR 13-002 Designating Brodifacoum, Bromadiolone, Difenacoum, and Difethialone (Second Generation Anticoagulant Rodenticide Products) as Restricted Materials, available at <http://www.cdpr.ca.gov/docs/legbills/rulepkgs/13-002/13-002.htm>

⁵ Cal. Food & Agr. Code § 14015.

⁶ Many other California municipalities have enacted similar resolutions, including the city of Malibu, in 2013. The Malibu resolution is available here: <http://www.raptorsarethesolution.org/wp-content/uploads/2013/07/MalibuResolution.pdf>